

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
Provision of Directory Listing Information)		
Under the Communications Act of 1934,)		CC Docket No. 99-273
As Amended)	
)	
The Use of N11 Codes and Other)	CC Docket No. 92-105
Abbreviated Dialing Arrangements)	
)	
Administration of the North American)	CC Docket No. 92-237
Numbering Plan)	

DECLARATION OF EDWARD J. CAPUTO

on behalf of WorldCom, Inc.

Based on my personal knowledge and on information learned in the course fo my business duties, I, Edward J. Caputo, declare as follows:

1. My name is Edward J. Caputo. I am Director of Operator and Directory Services for WorldCom. In this role I am responsible for Service Operations, Technical Support, Product Development, and Regulatory Support for Operator and Directory Services. I coordinate the activities of Marketing and Engineering organizations that develop and deploy local and long distance operator services and directory assistance services. My business address is 601 South 12th Street, Arlington, Virginia, 22202

2. I attended the University of Maryland in College Park, Maryland and earned a Bachelor of Science degree in Business Management. I have held management positions in the telecommunications field for the last 11 years. Prior to that I, held management positions in the Information Technology and Finance field. I have had

management responsibilities at WorldCom and its predecessor entity, MCI, since 1990 in the area of Operator and Directory Services.

3. The purpose of this affidavit is to provide comments in support the technical feasibility of 411 pre-subscription and use of 411XX Numbers, proposed by Telegate, in the Notice of Proposed Rulemaking (FCC 01-384). I will address current DA network deployment, the proposal for network deployment of pre-subscribed DA, and the proposed use of 411XX Numbers for competitive DA.

CURRENT DIRECTORY ASSISTANCE NETWORK DEPLOYMENT

4. Directory Assistance (DA) refers to a service in which users are provided with telephone numbers and, in some instances, addresses of individual telephone exchange service subscribers. The information provided to users is obtained from databases that contain the names, addresses, and telephone numbers of the telephone exchange service subscribers within particular geographic areas that do not elect to have unpublished numbers.

5. Local subscribers access local directory assistance by dialing the abbreviated dialing code, 411. When a caller dials 411, the Local Exchange Carrier (LEC) End Office (EO) switch performs a screening function on the dialed digits to determine how the call should be routed. In cases where 411 dialing is supported, the switch uses either in-switch screening logic or, in some cases, LECs use AIN capabilities, known as triggers, to provide call routing instructions to the switch.

6. If in-switch call screening is utilized, the switch examines the digits that were dialed and once the switch determines the dialed string, it consults screening tables within the switch to determine appropriate routing. If the switch utilizes AIN triggers,

then when the switch detects a digit string of 411 it temporarily suspends the call and sends a query, via the SS7 signaling network, to an element known as a Service Control Point (SCP). The SCP returns instructions, which provide the switch with directions on how the call is to be routed.

7. In today's environment most, if not all, LECs route 411 calls across dedicated access trunks either from the EO switch, or through a tandem switch to the LECs' DA service switching platform. This is because Incumbent LECs control the vast majority (over 90%) of all subscriber lines in any given switch in their own local network and dedicated trunks provide an efficient method of transporting DA calls to their DA platform.

8. Most of the LECs' DA platforms are equipped with Voice Response Units (VRU), Automatic Call Distributors (ACD), Directory Operator Call Centers and Call Handling workstations with an integrated Directory Assistance search and retrieval system and a Directory Assistance listing database. When a call is routed to the LEC's DA platform it is usually answered by a VRU. The VRU collects city, state and listing information from the caller and passes this information on to the DA operator. The DA operator searches the DA database for a listing and, if found, the DA operator releases the caller back to the VRU which provides the listing quote.

ALTERNATE LOCAL DIRECTORY ASSISTANCE CALL ROUTING

9. Presubscription requires that the LEC route DA calls in a different manner than they do today. Customized routing is necessary to change the routing of 411 calls to the ILEC's trunk, and instead, route the calls to the customer's DA provider's DA platform. The Commission envisioned this form of customized routing, in the UNE

Remand Order, for routing the 411 calls of a switch-less competing LEC's customer to an alternative DA provider or the CLEC's self provisioned platform.

10. As the Commission explained customized routing would allow the requesting CLEC to designate the trunks to which the ILEC must route the OS/DA traffic:

"Customized routing permits requesting carriers to designate the particular outgoing trunks associated with unbundled switching provided by the incumbent, which will carry certain classes of traffic originating from the requesting provider's customers. This feature would allow the requesting carrier to specify that OS/DA traffic from its customers be routed over designated trunks which terminate at the requesting carrier's OS/DA platform or a third party's OS/DA platform." *UNE Remand Order* at fn 867.

Except with pre-subscription or 411XX, the alternative provider will be selected by the customer rather than by the competing LEC.

11. It is technically feasible for a LEC to provide customized routing of 411 calls to alternative DA service providers using existing technologies, including advanced intelligent network (AIN) or line class codes and switch routing tables. WorldCom agrees with the position of Telegate as proposed by Mr. Celentano in his affidavit dated March, 2000, regarding AIN. It would be easier to utilize an AIN based methodology for routing 411 calls to an alternate provider selected by the caller. This is true whether the Commission decides that this should be done via pre-subscription or supported via a customer dialed 411XX Number.

12. While AIN is one way, it is not the only technically feasible approach. While AIN may be easier, WorldCom believes that LECs could effectively and efficiently use standard switch features and functions to support pre-subscription and/or customized routing of 411XX dialed calls.

WORLDCOM'S PROPOSED CUSTOMIZED ROUTING SOLUTION

13. As a CLEC, WorldCom has requested that LECs provide customized routing of 411 calls of its local customers, served via unbundled local switching, to existing WorldCom FGD trunks to its Long Distance network. WorldCom's proposal for customized routing of 411 calls is essentially the same, in concept, as Telegate's 411 pre-subscription proposal. It would also support routing to an alternate DA provider on calls dialed 411XX.

14. WorldCom's proposal requires LECs to route WorldCom's DA traffic using line class codes and other switch software features to shared access, FGD trunks to WorldCom's Long Distance Network. A LEC's switch will translate each WorldCom's customers' 411, call into a 10-digit number that the LEC will route like any other long-distance call it sends to WorldCom's Long Distance, FGD trunks. WorldCom has requested that LECs perform all switching functions and translations necessary to support this routing. LECs would then send these WorldCom calls, along with all other WorldCom long-distance (customer-originated 1+ calls where the WorldCom customer is PIC'd to WorldCom) to WorldCom's existing FGD trunks.

15. WorldCom's proposal requires that its customers' DA calls be translated into a new 10-digit number that the switch will send to WorldCom's long-distance FGD trunk groups. Routing tables in the switch will read the new 10-digit number as a 1+ call that goes to WorldCom as the customer's PIC'd long-distance carrier, and will send it to WorldCom's appropriate FGD trunk group.

16. WorldCom has tried to obtain customized routing in Arizona, California, Connecticut, Colorado, Virginia, Ohio, Missouri, Texas, Minnesota, Washington, and

Illinois. While WorldCom has not yet received customized routing in any of these states from any of the LECs that service them, it is interesting to note that many of them now claim to provide customized routing of 411 as part of their ICA's to CLECs. Qwest in Arizona, Colorado and Minnesota claims to provide customized routing via Line Class Codes and switch table routing and translations.

17. Today, WorldCom provides extensive DA services to its local facilities-based customers, and long distance customers. WorldCom strives to enhance its brand image by delivering feature consistency as well as reliable high quality with respect to automated and live operator handling. WorldCom prefers to control product content and delivery in all markets in which it participates in order to protect the value and image of its brand.

18. Through customized routing and pre-subscription or 411XX, WorldCom and other DA providers can offer more consumers their self-provisioned DA product. Self-provisioning would also allow the provider to directly control DA service offerings to their customers, enabling them to develop and deploy new and innovative services. WorldCom wants the opportunity to offer more consumers its self-provisioned DA services. In order to do so, LECs need to provide customized routing to direct WorldCom's DA customers' calls to WorldCom's DA platform.

SUMMARY

19. Customized routing of 411 calls is technically feasible using either an AIN approach or, as WorldCom has pointed out, using existing features and functions such as line class codes, switch translations and routing tables. A number of LECs have previously indicated that they will support 411 customized routing to requesting CLECs

via both of these methods. The Commission should order that 411 be opened to competitive providers via 411 pre-subscription or 411XX.

I, Edward J. Caputo, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on April 1, 2002

Edward J. Caputo